

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

MEDICAL EDUCATIONAL &
HEALTH SERVICE, INC.

Debtor

MEDICAL EDUCATIONAL &
HEALTH SERVICE, INC

Plaintiff,

v.

INDEPENDENT MUNICIPALITY OF
MAYAGUEZ, HON. JOSE GUILLERMO
RODRIGUEZ, IN HIS PERSONAL AND
OFFICIAL CAPACITY, HIS WIFE, MRS.
MARISEL MORA GONZALEZ AND
THEIR CONJUGAL PARTNESHIP OF
PROPERTY, DR. ORLANDO MARINI,
MR. JOSE QUIROS, HIS WIFE MARY
DOE QUIROS AND THEIR CONJUGAL
PARTNERSHIP OF PROPERTY,
SISTEMAS INTEGRADOS DE SALUD
DEL SUR OESTE, INC., MAYAGUEZ
MEDICAL CENTER-DR. RAMON
EMETERIO BETANCES, INC., MANATI
MEDICAL CENTER, INC., MR. JOHN
DOE; RICHARD ROE; INSURANCE
COMPANIES A, B AND C.

Defendants.

CASE NO.: 10-04905 (BKT)

CHAPTER 11

ADVERSARY NO.: 10-00148 (BKT)

RE: BREACH OF CONTRACT,
SPECIFIC PERFORMANCE,
TORTIOUS INTERFERENCE WITH
BUSINESS RELATION, , R.I.C.O.,
INJUNCTION AND DAMAGES

PLAINTIFF DEMANDS TRIAL BY
JURY

MOTION REQUESTING JOINDER OF CASES

TO THE HONORABLE BANKRUPTCY COURT:

COMES NOW Plaintiff/Debtor Medical Educational & Health Service, Inc.

(hereinafter referred to as MEDHS), represented through its undersigned

attorney and very respectfully informs the Court that the same set of operative

facts and incidents that underlie this action are the same as in Adversary Case

Number 10-00146 (BKT). Thus, the opposite parties' allegations in either case would be compulsory Counterclaims and affirmatives defenses in the other. For said reason it is respectfully requested that the cases be joined and be considered as one. MEDHS Complaint, Adversary Number 10-00148 (BKT) includes persons, natural and others, which would be third party defendants in MMC Complaint. They are being or have been served with MEDHS Complaint, Adversary Number 10-00148 (BKT) and will need to present their respective points of view to the Court.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 8th day of September, 2010.

I hereby certify that on September 8, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

/S/Rafael González Vélez
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